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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 SCOTT ALLAN, an individual,

10 Plaintiff,

vs.

11 PROGRESSIVE NORTHERN INSURANCE  
12 COMPANY dba PROGRESSIVE INSURANCE;  
DOES I through X, inclusive; and ROE  
13 CORPORATIONS I through X, inclusive,  
14 Defendants.

Case No: 2:22-cv-01424-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(Fourth Request)**

15 Defendant PROGRESSIVE NORTHERN INSURANCE COMPANY, and Plaintiff

16 SCOTT ALLAN, through their respective counsel submit the foregoing stipulation and order to  
17 extend discovery deadlines pursuant to LR 26-4 as follows:

18 1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	10/06/2022
Defendant's Initial Rule 26(a) Disclosures	11/09/2022
Defendant's First Set of Requests for Admission, Requests for Production and Interrogatories to Plaintiff	12/07/2022
Plaintiff's First Supplemental Rule 26(a) Disclosures	12/27/2022
Plaintiff's responses to Defendant's First Set of Requests for Admission, Request for Production and Interrogatories	01/10/2023
Plaintiff's Second Supplemental Rule 26(a) Disclosures	01/10/2023
Plaintiff's First Set of Interrogatories and Requests	01/20/2023

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Item	Date Completed
for Production to Defendant	
Plaintiff's Supplemental Responses to Defendant's First Requests for Production of Documents and Defendant's First Set of Interrogatories	02/03/2023
Plaintiff's Third Supplemental Rule 26(a) Disclosures	02/03/2023
Deposition of Plaintiff Scott Allan	02/06/2023
Defendant's First Supplemental Rule 26(a) Disclosures	02/09/2023
Defendant's Designation of Expert Witnesses	02/21/2023
Plaintiff's Designation of Expert Witnesses	02/21/2023
Defendant's Responses to Plaintiff's First Set of Requests for Production of Documents and Answers to Plaintiff's First Set of Interrogatories	03/13/2023

## 2. Discovery Remaining

The following discovery remains to be completed:

- a) Additional Written Discovery;
- b) Deposition of Person(s) Most Knowledgeable for Defendant;
- c) Deposition(s) of percipient witnesses;
- d) Deposition(s) of treating physicians;
- e) Disclosure of additional expert witnesses; and
- f) Deposition(s) all expert witnesses.

## 3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on August 23, 2023 with initial expert disclosures due on June 21, 2023. Although discovery has diligently progressed, additional time is required due to ongoing medical issues experienced by one of Defendant's experts. Said expert has undergone 2 recent surgeries and has been delayed in preparing his report due to those surgeries and the associated recuperation time. As such, the parties believe that good cause exists to justify extending the discovery deadlines and hereby request a short, 2 day extension of the discovery deadlines to allow for additional time for experts to provide their initial expert reports and to complete the remaining discovery.

4. New Schedule for Completing Discovery


Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	November 24, 2022	No Extension Requested
Expert Designations	June 21, 2022	June 23, 2023
Rebuttal Expert Designations	July 24, 2023	July 26, 2023
Discovery Cut-off	August 23, 2023	August 25, 2023
Dispositive Motions	September 20, 2023	September 22, 2023
Joint Pre-Trial Order	October 19, 2023	October 23, 2023

Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: June 20, 2023

**ERIC ROY LAW FIRM**

By:   
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DATED: June 20, 2023

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By: /s/ William H. Pruitt  
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**IT IS SO ORDERED.**

  
 UNITED STATES MAGISTRATE JUDGE

DATED: June 20, 2023

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